

# **EXHIBIT 6**

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**From:** Alex Frawley <AFrawley@susmangodfrey.com>  
**Sent:** Tuesday, February 1, 2022 1:55 PM  
**To:** Stephen Broome; QE Brown  
**Cc:** googleteam@lists.susmangodfrey.com  
**Subject:** RE: Brown v. Google

[EXTERNAL EMAIL from [afrawley@susmangodfrey.com](mailto:afrawley@susmangodfrey.com)]

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Stephen,

We look forward to speaking later, and here is some additional information in advance: With this proposed amendment, Plaintiffs do not seek to extend the case deadlines, nor serve brand new discovery. And the crux of the case remains Google's collection and use of private browsing information collected from users' visits to non-Google websites. Plaintiffs merely seek to conform their proposed class definitions to the evidence produced in discovery. The evidence shows that Google's collection and use of such private browsing information is not limited to Google Analytics and Ad Manager tracking, as the parties have discussed previously. This amendment is partly due to objections Google has asserted in response to Plaintiffs' 30(b)(6) deposition notices, seeking to prevent any testimony regarding AdSense and also Google's tracking of people visiting non-Google website after running a Google search. That Google tracking is within the scope of Plaintiffs' claims. In the draft joint dispute letter concerning those 30(b)(6) notices, we disclosed that Plaintiffs would seek to amend, and this is that amendment. If we need to file a motion, we'd like to do that tomorrow, so that the parties can then flag that in the joint case management statement due on Friday. We're happy to discuss this further later today.

Best,  
Alex

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**From:** Stephen Broome <stephenbroome@quinnemanuel.com>  
**Sent:** Monday, January 31, 2022 6:05 PM  
**To:** Alex Frawley <AFrawley@susmangodfrey.com>; QE Brown <qebrown@quinnemanuel.com>  
**Cc:** googleteam@lists.susmangodfrey.com  
**Subject:** RE: Brown v. Google

EXTERNAL Email

Alex:

Happy to meet and confer. How is 3:30 pm tomorrow?

In advance it would be helpful if you could explain the purpose of these amendments, and the implications (e.g., for discovery).

Thanks

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**From:** Alex Frawley <[AFrawley@susmangodfrey.com](mailto:AFrawley@susmangodfrey.com)>  
**Sent:** Monday, January 31, 2022 12:16 PM  
**To:** QE Brown <[qebrown@quinnemanuel.com](mailto:qebrown@quinnemanuel.com)>

Cc: [googleteam@lists.susmangodfrey.com](mailto:googleteam@lists.susmangodfrey.com)

Subject: Brown v. Google

[EXTERNAL EMAIL from [afrawley@susmangodfrey.com](mailto:afrawley@susmangodfrey.com)]

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Counsel,

Attached please find Plaintiffs' proposed Third Amended Complaint. The changes from the Second Amended Complaint are redlined.

Will Google stipulate to Plaintiffs filing this Complaint? We are happy to meet and confer with you tomorrow. If Google will not stipulate, then Plaintiffs will move for leave to file.

Best,  
Alex

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